

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

\$918,424.30 FROM KEY BANK
ACCOUNT ENDING IN 8014

\$100,000.00 FROM KEY BANK
ACCOUNT ENDING IN 8990 AND

\$496,435.71 FROM CHASE BANK
ACCOUNT ENDING IN 5971,

Defendants.

Civil Action No. 2:23-CV-749

VERIFIED COMPLAINT FOR FORFEITURE

AND NOW comes the United States of America, by and through its counsel, Troy Rivetti, Acting United States Attorney for the Western District of Pennsylvania, and Jill L. Locnikar, Assistant United States Attorney for the Western District of Pennsylvania, and respectfully represents as follows:

1. Plaintiff, the United States of America, brings this civil action *in rem* for forfeiture to the United States of the following property (collectively the “Defendant Property”) pursuant to 18 U.S.C. § 981(a)(1)(C):

- a. \$918,424.30 from Key Bank Account ending in 8014;
- b. \$100,000.00 from Key Bank Account ending in 8990; and
- c. \$496,435.71 from Chase Bank Account ending in 5971.

2. Jurisdiction is predicated upon 28 U.S.C. §§ 1345 and 1355. Venue is proper under 28 U.S.C. §§ 1395 and 1355.

3. In a “Business Email Compromise” (“BEC”) scheme, scammers infiltrate a recipient’s email account for nefarious reasons. It is known as a type of “phishing” scam that aims to manipulate someone into sending sensitive information or funds to a fraudster. It usually begins as a fake email purporting to originate from a well-known company (Amazon, Microsoft, etc.) asking the recipient to verify information in their account. Email users are prompted to click a hyperlink contained in the email. Once the illegitimate link is clicked by the user, scammers then have full control of the email address and send fraudulent emails to unsuspecting persons asking for money.

4. On or about June 1, 2022, George Gordon (“Gordon”) met a person named Salem Mohd Obaidalla (“Obaidalla”) on the social network LinkedIn. Gordon said that Obaidalla introduced himself as a “Project Manager” with a London based company called “Commercial Finance Consulting Limited” (“CFC”). According to Gordon, CFC wanted to invest in Gordon’s oil and gas company, S and G Coil and Consulting (“S and G”). CFC promised to invest \$2.5 million dollars into Gordon’s company in return for 3% of Gordon’s revenue from S and G. Gordon said he was instructed by Obaidalla to open a personal bank account with J.P. Morgan Chase to receive the wired funds (hereafter, “Chase 7333”). Gordon agreed, and on or about June 6, 2022, opened Chase account 7333 to receive the “investment” from CFC. On September 29, 2022, Gordon stated he received a wire of funds into Chase 7333 in the amount of \$2,502,785.88 from a company called ProBuild Company LLC-Trust, which is a subsidiary of Builders FirstSource (“Builders”).

5. Builders was the original source of the \$2,502,785.88 wired to Gordon’s Chase Bank account 7333. Representatives of Builders informed law enforcement that Builders was ordered to satisfy an arbitration award in favor of a New York company called Lecesce

Construction (“Lecesse”) in the amount of \$2,502,785.88. Builders’ representatives stated that on September 26, 2022, they received an email purporting to originate from Lecesse counsel, Patrick Crowell, Esq. (“Crowell”), an attorney in Winter Park, Florida, with instructions to “wire” the award proceeds to the Chase Bank 7333. The email coming from Crowell originated from richm.pikecos@xesq.net, which is known to contain a foreign address.

6. An attorney for Builders, Tim Ford, received the wire instructions and, subsequently, wired the payment of \$2,502,785.88 to the Chase account ending in 7333.

7. When Crowell was interviewed, he stated he was hired by Lecesse to represent it in its case against Builders. Crowell explained that sometime in June 2022, he believed his email account was compromised. Crowell stated his real email address is [“pcrowell@patrickcrowell.com.”](mailto:pcrowell@patrickcrowell.com) Crowell said that in June 2022, he “clicked on something that he shouldn’t have.” Crowell recalled that previously, he and his wife, who also works at his law firm, received an email from whom they believed was ‘Microsoft Corporation’ telling them that they needed to “change their passwords.” Crowell unwittingly clicked on the link.

8. After the payment was wired to Chase 7333, and based upon instructions received from Obaidalla, on October 5, 2022, Gordon transferred the entire balance from the Chase 7333 account into a newly created “S and G Coil” business account at Chase Bank ending in 5216. On the same date, Gordon then transferred the entire balance of Chase 5216 into his personal account at Chase Bank ending in account number 5971 (hereafter, “Chase 5971”). Then, on the same date, Gordon was instructed to transfer approximately \$886,000 from Chase 5971 to an existing personal account in his name at Key Bank, ending in account number 8014 (hereafter, “Key Bank 8014”).

9. In addition, upon instruction from Obaidalla, between October 12, 2022, and October 27, 2022, Gordon purchased approximately \$700,000 worth of Bitcoin at cryptocurrency exchanges River Financial, Cboe Digital, Gemini and Coinbase from the funds in the target accounts.

10. For example, Gordon stated to law enforcement that on October 11, 2022, he attempted to wire \$890,000 from Chase 5971 to crypto currency exchange Gemini. On October 21, 2022, Gemini, however, returned the funds he deposited due to suspected fraud. Also using funds from Chase 5971, Gordon said he attempted to deposit \$100,000 to Gemini in a separate transaction. Gordon said that Key Bank 8990 (opened 10/13/22), was also connected to said Gemini account. Gordon explained that Gemini returned the \$100,000 due to “suspected fraud” to Key Bank 8990 instead of Chase 5971 since “both bank accounts were linked to Gemini.”

11. Accordingly, funds contained in each of the accounts represent property that constitutes or is derived from proceeds traceable to violations of 18 U.S.C. § 1343.

12. Records reveal that Key Bank Accounts ending in 8990 and 8014 and Chase Bank Account ending in 5971 were opened in the name of George Gordon. On or about January 19, 2023, pursuant to federal seizure warrants, funds in those accounts in the amount of \$1,514,860.01 were seized.

13. By reason of the foregoing, the Defendant Property is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

WHEREFORE, the United States respectfully requests that process of a warrant *in rem* issue for the arrest of the Defendant Property; that judgment of forfeiture be entered in favor of the United States for the Defendant Property; and that the United States be granted such relief as this Honorable Court may deem just and proper, together with the costs and disbursements of this action.

Respectfully submitted,

TROY RIVETTI
Acting United States Attorney


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VERIFICATION

I am a Special Agent of the United States Secret Service, and the case agent assigned the responsibility for this case. I have read the contents of the foregoing complaint for forfeiture and the statements contained therein are true and correct to the best of my knowledge and belief.

I verify under penalty of perjury that the foregoing is true and correct. Executed on this

5th day of May, 2023.



Thomas Webster, Special Agent
United States Secret Service